

PAMELA Y. PRICE, ESQ. (STATE BAR NO. 107713)  
P.O. Box 5843  
Oakland, CA 94605  
Telephone: (510) 452-0292  
E-mail: [pamela@pypesq.com](mailto:pamela@pypesq.com)

LAWRENCE WHITE, ESQ. (STATE BAR NO. 69531)  
195 - 41 Street, P.O. Box 11213  
Oakland, CA 94611  
Telephone: (510) 250-9040  
E-mail: [larrywhitelcw@yahoo.com](mailto:larrywhitelcw@yahoo.com)

Attorneys for Intervenors COALITION FOR  
POLICE ACCOUNTABILITY, RASHIDAH  
GRINAGE, SAIED KARAMOOZ, ANNE JANKS  
AND JOHN JONES, III

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DELPHINE ALLEN, et al.,	)	CASE NO. C00-cv-04599-WHO
Plaintiffs,	)	
v.	)	<b>DECLARATION OF SAIED KARAMOOZ IN</b>
	)	<b>SUPPORT OF THE INTERVENORS'</b>
	)	<b>MOTION TO INTERVENE AS OF RIGHT, OR</b>
CITY OF OAKLAND, et al.,	)	<b>IN THE ALTERNATIVE, PERMISSIVE</b>
	)	<b>INTERVENTION</b>
Defendants.	)	
	)	DATE: MAY 8, 2019
	)	TIME: 2:00 P.M.
	)	DEPT: 2, 17 <sup>TH</sup> FLOOR

I, SAIED KARAMOOZ, hereby declare:

1. I make this Declaration on personal knowledge in support of the Coalition for Police Accountability and other community representatives' Motion to intervene in this action.

2. I am a resident of Oakland, California. I have lived in Oakland for nearly a decade. I live in Jack London, an affluent neighborhood, and commute to West Oakland, a community with higher population of low-income residents, for work on a daily basis. While I see OPD officers engaging with patrons of the local Jack London Farmers Market on Sunday mornings as they patrol it on foot on a regular basis, the only presence of OPD officers in West Oakland I see is limited to patrol vehicles and aggressive and racially biased conduct toward residents of West Oakland who

1 are predominantly Black.

2 3. On more than one occasion, my wife and I have witnessed and challenged OPD's  
3 excessive use of force as inhumane and disrespectful. On February 25, 2015, we witnessed  
4 apprehension of a suspect who was tackled to the ground within seconds of encountering officers  
5 causing facial injury to the suspect who did not resist arrest at any time. On a separate occasion, on  
6 June 17, 2015, at around 3 p.m., I witnessed a handcuffed black youth at the bus station in front of  
7 West Oakland Library, with no fewer than eight OPD officers surrounding him. In response to my  
8 inquiry about the situation, the OPD officer in charge informed me that they had apprehended the  
9 gentleman who was riding a green scooter as a result of a report of a stolen green motorcycle. In all  
10 fairness, I sensed that he realized the absurdity of his statement as I looked at him in disbelief. He  
11 told me that they were continuing to hold him because he did not have identification on him and  
12 that they were waiting for a friend to bring his identification.

13 4. On another occasion, in the summer of 2018, my wife and I witnessed a slow car  
14 chase on 7th street (in West Oakland) on a Friday afternoon as OPD officers surrounded the vehicle  
15 and came out with their guns drawn at a suspect (a black young man) who exited the car with his  
16 hands on his head, walking backwards as directed by the officers, and posing absolutely no threat to  
17 the officers, himself, or others. My wife and I got off our bicycles to seek shelter behind a parked  
18 car to protect ourselves from the danger related to the OPD officers' conduct, not the suspect. I  
19 have never witnessed this type of aggressive and unnecessarily violent behavior by OPD toward any  
20 white individual in my neighborhood. Never. And yet I see it frequently in West Oakland.

21 5. I believe that I am a suitable intervenor who will represent and advocate for the  
22 interests of the Coalition for Police Accountability and the residents of the City of Oakland. I  
23 believe that community involvement at this stage of the NSA will expedite the transformation of  
24 our police department and dramatically improve community-police relations. I believe that  
25 community representation is essential to address the impact that the NSA has on our community.

26 6. I am a graduate of Penn State University where I earned my Bachelors degree in  
27 Computer Science (1986), my Masters degree in Business Administration (2001) and a Masters  
28

1 degree in Information Sciences (2003).

2       7. During the time that I have lived in Oakland, I have participated in a number of  
3 community organizations, such as Oakland Justice Coalition, Coalition for Police Accountability,  
4 and Oakland Privacy Advocacy Group. I also serve on the Coalition for Police Accountability's  
5 Steering Committee. The Coalition's mission is to advocate for accountability of the Oakland  
6 Police Department to the community so that the Oakland Police Department operates with  
7 equitable, just, constitutional, transparent policies and practices that reflect the values and engender  
8 the trust of the community.

9       8. I participated in the community movement to pass Measure LL, the enabling  
10 legislation to create an independent police commission in Oakland. I worked tirelessly to collect  
11 signatures for the petition, secure the support of elected officials, and inform the public of the  
12 importance of the measure. In the past, I have also represented residents of Oakland as a  
13 Commissioner on the Privacy Advisory Commission and as the President of Jack London  
14 Improvement District.

15       9. As a resident of Oakland, I am very concerned about lawless police misconduct,  
16 particularly when it results in physical harm or death to persons present in our City. I am very  
17 concerned about unconstitutional misconduct by our police, including the use of excessive force,  
18 racial profiling, perjury and the obstruction of justice. I pay property taxes, sales taxes, business  
19 permit taxes and state income tax. I am very concerned that my tax dollars have been used to pay  
20 for the monitoring activities mandated by this Court under the NSA. I believe that the money we  
21 spend annually on the NSA and lawsuits arising out of the abuse of police power could be better  
22 used to address some of the pressing issues we have in Oakland.

23       10. I was shocked and stunned by the killing in North Oakland of Joshua Pawlik in  
24 March 2018. In March 2019, I learned of the circumstances under which Mr. Pawlik died. When I  
25 learned from the public disclosure of the OPD investigation and Chief Anne Kirkpatrick's  
26 disciplinary actions, I was extremely upset and ashamed and felt compelled to intervene in this  
27 lawsuit. Prior to the release of the documents about the death of Joshua Pawlik, I was not aware  
28

1 how little regard Chief Kirkpatrick has for the rights and safety of the residents of Oakland.

2 11. I fully support the request by the Coalition for Police Accountability for the  
3 Court-appointed Monitor Robert Warshaw to terminate Chief Anne Kirkpatrick. None of the  
4 parties to the litigation have requested Chief Kirkpatrick's termination. I agree with Mr.  
5 Warshaw's assessment that Chief Kirkpatrick's analysis of the use of force that resulted in the death  
6 of Joshua Pawlik is "disappointing and myopic." As a resident of Oakland, I should not be forced  
7 to live with a police department under the failed leadership of Chief Kirkpatrick.

8 12. None of the parties to this action are taking the appropriate steps to reduce the  
9 amount of money that the City is paying for the enforcement of the NSA. None of the parties to the  
10 litigation have been able to effectively curtail the use of excessive force by OPD or the amount of  
11 racial profiling that occurs every day in our City.

12 13. At the time that I agreed to serve as an Intervenor in this action, Attorney Pamela Y.  
13 Price explained to me what my duties and responsibilities will be if I am permitted to represent my  
14 community in this way. If our motion is granted and I am allowed to intervene in the action, I will  
15 fairly and adequately represent the interests of the residents of the City of Oakland throughout the  
16 course of the litigation to the best of my ability.

17 14. Mayor Libby Schaaf's public statements about the departure of former OPD Sean  
18 Whent have not been consistent. I saw Mayor Schaaf on the news in 2016 stating that Chief Whent  
19 had stepped down for personal reasons, and that his departure had nothing to do with the sexual  
20 misconduct scandal. Later, when running for re-election in 2018, I heard and saw Mayor Schaaf  
21 say that she fired Chief Whent.

22 I declare under penalty of perjury under the laws of the State of California and the United  
23 States that the foregoing is true and correct. If called as a witness, I could and would testify  
24 competently to the matters stated in this Declaration.

25 Executed in Oakland, California on April 2, 2019.

26  
27 /s/ Saied Karamooz  
28 SAIED KARAMOOZ, Declarant